

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF NEW YORK

UNITED STATES * DOCKET NO. 11CR27 (ENV)

v. *

MANUEL SALGADO * May 16th, 2012

CONSENT MOTION TO MODIFY CONDITIONS OF PRE TRIAL RELEASE

1.

Mr. Salgado's conditions of Pre Trial release prohibit him from leaving the Districts of New Jersey and the Southern and Eastern Districts of New York.

2.

Mr. Salgado's mother due to medical reasons cannot fly. She is 83 years old and resides in Conway, South Carolina. Mr. Salgado wishes to drive to South Carolina to visit his mother as needed due to her uncertain medical needs and a desire to remain in contact with her. Additionally, he has secured employment for a livery service that will require him to drive to and through the Districts of Connecticut and Pennsylvania.

3.

I have spoken with the prosecutor and probation we all agree a modification allowing him to travel anywhere other than the Districts of New Jersey and the Eastern District

of New York "as and in a manner approved by pretrial services" is the best modification as it will allow pretrial to work with him and his work schedule and allow travel without having to come to court for every trip. This will also allow per trial to modify it in a more restrictive manner if his job no longer requires trips to a certain district or his mother relocates.

4.

Therefore, I am seeking a limited modification allowing Mr. Salgado to travel outside of his current limits as approved by pretrial services.

5.

I have contacted the Assistant United States Attorney and she has no objection to this request being granted.

RESPECTFULLY SUBMITTED,
s/J. Patten Brown, III
J. PATTEN BROWN, III
Law Offices of Pat Brown
110 Wall Street, 11th Floor
New York, NY 10005

757 West Main Street
New Britain, CT 06053

(860) 223-3355
fax: (860) 827-8459
jpb@patbrownlaw.com
Ct Fed Bar No. ct27633
TN BPR No. 021970
La. Bar Roll No. 21503
NY Reg. No. 460891

CERTIFICATE OF SERVICE

I hereby certify that this Consent Motion to Amend Conditions of Pre Trial Release by J. Patten Brown, III was forwarded electronically via the Court's electronic filing system to all counsel of record this 16th day of May, 2012.

S/J. Patten Brown, III
J. Patten Brown, III
Attorney at Law